

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In Re:

District Court Case No. 15-53145-MLO
Bankruptcy Court Case No. 17-04596-

MLO

INTEGRATED HEALTH GROUP, P.C.,

Chapter 7

Debtor,

Hon. Maria Oxholm

BASIL SIMON, Trustee for Chapter 7 Debtor
Integrated Health Group, P.C., INTEGRATED
HEALTH CARE SYSTEMS, LLC, INTEGRATED
HCS PRACTICE MANAGEMENT, LLC,
INTEGRATED HCS IMAGING SERVICES
MANAGEMENT, LLC

Plaintiffs,

Vs.

HUSSEIN HURAIBI, NOURA HURAIBI,
SAMEERAH HURAIBI CORTEX, MOHAMED
SALKINI, GEBRE ASHEBIR, MICHAEL J. PENN,
YISROEL SIGLER, SAMI AHMED, FAISAL
AHMED, PARAMOUNT HEALTHCARE
MANAGEMENT, LLC, NA WORLD HOLDINGS,
LLC, HURAIBI ENTERPRISES II, LLC, HURAIBI
PAIN & REHAB INSTITUTE, PLLC, HURAIBI
REHAB INSTITUTE, PLLC, HUSSEIN A.
HURAIBI, M.D., PLLC, ANESTHESIA
CONSULTANTS OF MICHIGAN, PLLC,
KETAMINE INFUSION CENTERS OF
MICHIGAN, PLLC, JOHN DOES 1-17, AND JANE
DOES 1-20,

Defendants.

SIMON, STELLA & ZINGAS, P.C.

By: Stephen P. Stella (P33351)

Attorney for Plaintiffs

645 Griswold, Ste. 3466

Detroit, MI 48226

313-962-6400

THOMPSON STEWART, P.C.

By: Ronald S. Thompson (P39732)

Trevor A. Stewart (P77972)

Attorneys for Mohamed Salkini and
Ahmed Salkini

41000 West Seven Mile Road, Ste. 230

Northville, MI 48167

248-912-0670

DEFENDANT'S ANSWER TO AMENDED ADVERSARY COMPLAINT

Defendants, Mohamed Salkini and Ahmed Salkini, by and through their attorneys, Thompson Stewart, P.C., and in their Answer to Amended Adversary Complaint, state as follows:

PARTIES AND RELATED ENTITIES

1. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.
2. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.
3. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.
4. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.
5. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.
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23. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

24. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.
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26. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.
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35. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.
36. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

37. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

38. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

JURISDICTION, CORE PROCEEDING, and VENUE

39. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

40. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

41. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

42. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

43. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

FORMATION OF IHG

44. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

45. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

46. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

47. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

48. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

49. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

50. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

51. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

AGREEMENT BETWEEN IHG AND IHCS

52. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

53. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

54. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

55. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

56. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

57. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

58. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

HURAI'DI'S WRONGFUL CONDUCT LEADING TO IHG'S DEMISE

59. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

60. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

61. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.
62. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.
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75. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.
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81. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.
82. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.
83. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.
84. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

THE FRAUDULENT TRANSFERS

85. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

86. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.
87. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.
88. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.
89. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.
90. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.
91. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.
92. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.
93. Denied for the reason that it is untrue.
94. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.
95. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.
96. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.
97. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.
98. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.
99. Denied for the reason that it is untrue.

100. Denied for the reason that it is untrue.
101. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.
102. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.
103. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.
104. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.
105. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.
106. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.
107. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.
108. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.
109. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.
110. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.
111. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.
112. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

113. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

114. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

115. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

116. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

CAUSES OF ACTION

COUNT 1: BREACH OF STATUTORY AND COMMON LAW FIDUCIARY DUTIES

117. Defendants incorporate Answers 1 through 116 by reference as though fully set forth herein.

118. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

119. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

120. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

1A: Breach of Duty of Care

121. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

122. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

123. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

124. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

125. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

WHEREFORE, Defendants request this honorable Court dismiss Plaintiff's Adversary Complaint and award Defendants their costs and attorney fees so wrongfully incurred.

1B: Breach of Duty of Loyalty

126. Defendants incorporate Answers 1 through 125 by reference as though fully set forth herein.

127. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

128. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

129. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

130. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

131. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

WHEREFORE, Defendants request this honorable Court dismiss Plaintiff's Adversary Complaint and award Defendants their costs and attorney fees so wrongfully incurred.

1C: Breach of Duty of Good Faith

132. Defendants incorporate Answers 1 through 131 by reference as though fully set forth herein.

133. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

134. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

135. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

136. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

WHEREFORE, Defendants request this honorable Court dismiss Plaintiff's Adversary Complaint and award Defendants their costs and attorney fees so wrongfully incurred.

COUNT 2 – USURPATION OF CORPORATE OPPORTUNITIES

137. Defendants incorporate Answers 1 through 136 by reference as though fully set forth herein.

138. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

139. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

140. Denied for the reason that it is untrue.

141. Denied for the reason that it is untrue.

142. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

143. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

144. Denied for the reason that it is untrue.

WHEREFORE, Defendants request this honorable Court dismiss Plaintiff's Adversary Complaint and award Defendants their costs and attorney fees so wrongfully incurred.

COUNT 3 – FRAUDULENT TRANSFERS

145. Defendants incorporate Answers 1 through 144 by reference as though fully set forth herein.

146. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

147. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

148. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

149. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

150. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

3A: Fraudulent Transfer of ACOM

151. Defendants incorporate Answers 1 through 150 by reference as though fully set forth herein.

152. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

153. Denied for the reason that it is untrue.

154. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

155. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

156. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

157. Denied for the reason that it is untrue.

158. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

159. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

160. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

161. Denied for the reason that it is untrue.

WHEREFORE, Defendants request this honorable Court dismiss Plaintiff's Adversary Complaint and award Defendants their costs and attorney fees so wrongfully incurred.

3B: Fraudulent Transfer of Van Buren Pharmacy

162. Defendants incorporate Answers 1 through 161 by reference as though fully set forth herein.

163. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

164. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

165. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

166. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

167. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

168. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

169. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

170. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

171. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

172. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

WHEREFORE, Defendants request this honorable Court dismiss Plaintiff's Adversary Complaint and award Defendants their costs and attorney fees so wrongfully incurred.

3C: Fraudulent Transfer of Great Lakes Laboratory

173. Defendants incorporate Answers 1 through 172 by reference as though fully set forth herein.

174. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

175. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

176. Denied for the reason that it is untrue.

177. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

178. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

179. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

180. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

181. Denied for the reason that it is untrue.
182. Denied for the reason that it is untrue.
183. Denied for the reason that it is untrue.

WHEREFORE, Defendants request this honorable Court dismiss Plaintiff's Adversary Complaint and award Defendants their costs and attorney fees so wrongfully incurred.

3D: Fraudulent Transfer of The Monroe Property

184. Defendants incorporate Answers 1 through 183 by reference as though fully set forth herein.
185. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.
186. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.
187. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.
188. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.
189. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.
190. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.
191. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.
192. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

193. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

194. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

WHEREFORE, Defendants request this honorable Court dismiss Plaintiff's Adversary Complaint and award Defendants their costs and attorney fees so wrongfully incurred.

3E: Fraudulent Transfer – CON/MRI Business

195. Defendants incorporate Answers 1 through 194 by reference as though fully set forth herein.

196. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

197. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

198. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

199. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

200. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

201. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

202. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

WHEREFORE, Defendants request this honorable Court dismiss Plaintiff's Adversary Complaint and award Defendants their costs and attorney fees so wrongfully incurred.

3F: Fraudulent Transfer – Wire Transfer

203. Defendants incorporate Answers 1 through 202 by reference as though fully set forth herein.

204. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

205. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

206. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

207. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

208. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

209. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

210. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

211. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

3G: Fraudulent Transfer – IHG's Receivables, Patient List, Patient Base, and/or Good Will

212. Defendants incorporate Answers 1 through 211 by reference as though fully set forth herein.

213. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

214. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

215. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.
216. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.
217. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.
218. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.
219. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.
220. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

COUNT 4 – COMMON LAW AND STATUTORY CONVERSION

221. Defendants incorporate Answers 1 through 220 by reference as though fully set forth herein.
222. Denied for the reason that it is untrue.
223. Denied for the reason that it is untrue.
224. Denied for the reason that it is untrue.
225. Denied for the reason that it is untrue.

WHEREFORE, Defendants request this honorable Court dismiss Plaintiff's Adversary Complaint and award Defendants their costs and attorney fees so wrongfully incurred.

COUNT 5 – CIVIL CONSPIRACY

226. Defendants incorporate Answers 1 through 225 by reference as though fully set forth herein.
227. Denied for the reason that it is untrue.

228. Denied for the reason that it is untrue.
229. Denied for the reason that it is untrue.
230. Denied for the reason that it is untrue.

WHEREFORE, Defendants request this honorable Court dismiss Plaintiff's Adversary Complaint and award Defendants their costs and attorney fees so wrongfully incurred.

COUNT 6 – SUCCESSOR LIABILITY

231. Defendants incorporate Answers 1 through 230 by reference as though fully set forth herein.
232. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.
233. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.
234. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.
235. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.
236. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.
237. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

WHEREFORE, Defendants request this honorable Court dismiss Plaintiff's Adversary Complaint and award Defendants their costs and attorney fees so wrongfully incurred.

COUNT 7 – BREACH OF SUBSCRIPTION AGREEMENT

238. Defendants incorporate Answers 1 through 237 by reference as though fully set forth herein.

239. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

240. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

241. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

WHEREFORE, Defendants request this honorable Court dismiss Plaintiff's Adversary Complaint and award Defendants their costs and attorney fees so wrongfully incurred.

COUNT 8 – UNJUST ENRICHMENT

242. Defendants incorporate Answers 1 through 241 by reference as though fully set forth herein.

243. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

244. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

WHEREFORE, Defendants request this honorable Court dismiss Plaintiff's Adversary Complaint and award Defendants their costs and attorney fees so wrongfully incurred.

COUNT 9 – UNJUST ENRICHMENT

245. Defendants incorporate Answers 1 through 244 by reference as though fully set forth herein.

246. Denied for the reason that it is untrue.

247. Denied for the reason that it is untrue.

WHEREFORE, Defendants request this honorable Court dismiss Plaintiff's Adversary Complaint and award Defendants their costs and attorney fees so wrongfully incurred.

COUNT 10 – CIVIL RICO

248. Defendants incorporate Answers 1 through 247 by reference as though fully set forth herein.

249. Denied for the reason that it is untrue.

250. Denied for the reason that it is untrue.

251. Denied for the reason that it is untrue.

252. Denied for the reason that it is untrue.

253. Denied for the reason that it is untrue.

254. Denied for the reason that it is untrue.

255. Denied for the reason that it is untrue.

256. Denied for the reason that it is untrue.

257. Denied for the reason that it is untrue.

258. Denied for the reason that it is untrue.

259. Denied for the reason that it is untrue.

260. Denied for the reason that it is untrue.

261. Denied for the reason that it is untrue.

262. Denied for the reason that it is untrue.

WHEREFORE, Defendants request this honorable Court dismiss Plaintiff's Adversary Complaint and award Defendants their costs and attorney fees so wrongfully incurred.

COUNT 11 – EQUITABLE SUBORDINATION OF CLAIMS

263. Defendants incorporate Answers 1 through 262 by reference as though fully set forth herein.

264. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

265. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.
266. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.
267. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.
268. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.
269. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.
270. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.
271. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.
272. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.
273. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.
274. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.
275. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

WHEREFORE, Defendants request this honorable Court dismiss Plaintiff's Adversary Complaint and award Defendants their costs and attorney fees so wrongfully incurred.

COUNT 12 – CLAIM DISALLOWANCE – 11 U.S.C. §502(d)

276. Defendants incorporate Answers 1 through 275 by reference as though fully set forth herein.

277. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

278. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

279. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

280. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

281. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

WHEREFORE, Defendants request this honorable Court dismiss Plaintiff's Adversary Complaint and award Defendants their costs and attorney fees so wrongfully incurred.

COUNT 13 – BREACH OF CONTRACT

282. Defendants incorporate Answers 1 through 281 by reference as though fully set forth herein.

283. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

284. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

285. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.


286. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

287. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

288. Neither admitted nor denied for the reason that Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegation.

WHEREFORE, Defendants request this honorable Court dismiss Plaintiff's Adversary Complaint and award Defendants their costs and attorney fees so wrongfully incurred.

THOMPSON STEWART, P.C.


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Dated: September 25, 2017